

1 TREVOR J. HATFIELD, ESQ
2 Nevada Bar No. 7373
3 HATFIELD & ASSOCIATES, LTD.
4 703 S. Eighth Street
5 Las Vegas, Nevada 89101
6 Telephone: (702) 388-4469
7 Facsimile: (702) 386-9825
8 Email: thatfield@hatfieldlawassociates.com
9 Attorney for Plaintiff In conjunction with Legal Aid
10 Center of Southern Nevada Pro Bono Project

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 JUSTIN L. TRIPP,
11 Plaintiff,
12 vs.
13 CLARK COUNTY, et al
14 Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' FOUR
MOTIONS FOR SUMMARY
JUDGMENT
(First Request)**

15 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law
16 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza,
17 Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacqulyn
18 Schumaker and Defendants LVMPD Sergeants' (hereinafter "Defendants") by and through their
19 counsel, the law firm of Kaempfer Crowell, hereby stipulate and agree to extend the time for
20 Plaintiff to Respond to the following Defendants' Motions for Summary Judgment, due on May
21 17, 2021, to July 16, 2021:

22
23
24 1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];
25
26 2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment
27 [ECF #199];
28
29 3. Defendants Michael Rose's and Jacqulyn Schumaker's Motion for Summary Judgment
30 [ECF #200];

1 4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].

2 This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first
3 request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary
4 Judgment.

5 Good cause exists for this extension. Plaintiff's counsel is requesting a sixty (60) day
6 extension of time up to and including July 16, 2021, to respond to all parties' Motions for
7 Summary Judgment as Plaintiff is in prison, communication must be scheduled, and the volume
8 of the motions. Defendant has courteously granted this extension of time for Plaintiff to file his
9 Response. Accordingly, Plaintiff shall have up to and including July 16, 2021, to respond to
10 Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200] and [ECF
11 #201].

12 DATED this 11th day of May, 2021

13 **HATFIELD & ASSOCIATES**

14 By: */s/ Trevor J. Hatfield*

15 TREVOR J. HATFIELD, ESQ. (SBN 7373)
16 703 S. Eighth Street
17 Las Vegas, Nevada 89101
18 Tel: (702) 388-4469
19 Email: thatfield@hatfieldlawassociates.com
20 *Attorney for Plaintiff In Conjunction with
21 Legal Aid Center of Southern Nevada Pro
Bono Project.*

22 DATED this 11th day of May, 2021

23 **KAEMPFER CROWELL**

24 By: */s/ Lyssa S. Anderson*

25 LYSSA S. ANDERSON, ESQ. (SBN 5781)
26 RYAN W. DANIELS, ESQ. (SBN 13094)
27 1980 Festival Plaza Drive, Ste. 650
28 Las Vegas, Nevada 89135
29 Tel: (702) 792-7000
30 Email: landerson@kcnvlaw.com
31 Email: rdaniels@kcnvlaw.com
32 *Attorneys for Defendant Cesar Esparza*

33 ///

34 ///

35 ///

36 ///

37 ///

1 DATED this 11th day of May, 2021.

2 **LAURIA TOKUNAGA GATES & LINN, LLP**

3 */s/ Paul A. Cardinale*

4 By: _____
5 PAUL A. CARDINALE, ESQ. (SBN 8394)
6 1755 Creekside Oaks Drive, Suite 240
7 Sacramento, CA 95833
8 Tel.: (916) 492-2000
9 Email: pcardinale@ltglaw.net

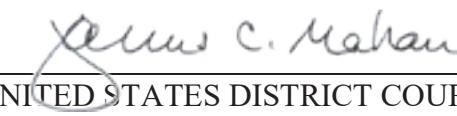
10 **Southern Nevada Office:**

11 601 South Seventh Street
12 Las Vegas, NV 89101
13 Tel.: (702) 387-8633

14 *Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his
15 individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH
16 (formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as
17 SCHULTZ") in her individual capacity, and RAYMOND MONDORA*

18 **ORDER**

19 **IT IS SO ORDERED:**

20 
21 UNITED STATES DISTRICT COURT JUDGE

22 **May 13, 2021**
23 Dated: _____